

1 **Marquis Aurbach**
2 Craig R. Anderson, Esq.
3 Nevada Bar No. 6882
4 Jackie V. Nichols, Esq.
5 Nevada Bar No. 14246
6 10001 Park Run Drive
7 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
canderson@maclaw.com
jnichols@maclaw.com
Attorneys for Defendants Las Vegas Metropolitan
Police Department and Captain Dori Koren

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 PETER LYKINS, an individual; MARIA
LYKINS, an individual,

Case Number:
2:22-cv-01068-APG-BNW

11 Plaintiffs,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
14 DEPARTMENT, in its official capacity;
15 DORI KOREN, as an individual and in his
capacity as a Las Vegas Metropolitan Police
16 Department Officer; DOE OFFICERS 1-15,
as individuals and in their capacity as Las
17 Vegas Metropolitan Police Department
Officers; and ROE DEFENDANTS 1-10,

18 Defendants.

**STIPULATION AND ORDER TO STAY
DISCOVERY AND OTHER
DEADLINES PENDING SETTLEMENT
DISCUSSIONS**
(FIRST REQUEST)

19 Plaintiffs Peter Lykins and Maria Lykins (“Plaintiffs”), by and through their counsel
20 of record, Lisa A. Rasmussen., Esq. and Richard Bryant, Esq., of Law Offices of Kristina
21 Wildeveld & Associates and Defendants Las Vegas Metropolitan Police Department
22 (“LVMPD”) and Captain Dori Koren (“Koren”) (hereinafter “LVMPD Defendants”), by and
23 through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with
24 the law firm of Marquis Aurbach Coffing, (collectively the “Parties”), and hereby agree and
25 jointly stipulate the following:

26 1. During a recent telephone to discuss discovery, including production of Body
27 Worn Camera videos conducted in January 2023, the Parties determined that this matter may
28 be appropriate for possible resolution and that a stay of discovery and other deadlines would

1 allow the Parties to explore the possibility of settlement, without incurring the time and
2 expense of ongoing discovery and other work during settlement discussions.

3 2. The Parties agree that all deadlines in this matter be stayed for a forty-five
4 (45) day period. Parties further agree that within fifteen (15) days after completion of the
5 contemplated settlement discussions, if not successful, the parties will submit a stipulated
6 schedule regarding any pending motions or discovery which will extend all applicable dates
7 for the commensurate time period that they were stayed in accordance with Rule 26 of the
8 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the Unites States
9 District Court, for the Court's approval.

10 3. Given the amount of Body Worn Camera videos at issue, LVMPD will
11 continue to review the videos and supplement disclosures in accordance with Rule 26.

12 4. Accordingly, the Parties hereby agree and request the Court to enter a stay of
13 all deadlines in the instant case.

14 5. This is the Parties' first request for a stay of deadlines in this matter.

15 6. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate
16 in the exchange of information as needed to facilitate settlement.

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 7. The Parties both submit that the instant stipulation is being offered in good
2 faith and not for the purpose of delay.

3 IT IS SO STIPULATED.

4 DATED this 17th day of January, 2023

5 LAW OFFICES OF KRISTINA
6 WILDEVELD & ASSOCIATES

7 By: /s/ Lisa A. Rasmussen

8 Lisa A. Rasmussen, Esq.
9 Nevada Bar No. 7491
10 Richard Bryant, Esq.
11 Nevada Bar No. 15511
12 550 E. Charleston Blvd., Suite A
13 Las Vegas, Nevada 89104
14 Attorneys for Plaintiffs Peter and Maria
15 Lykins

DATED this 17th day of January, 2023

MARQUIS AURBACH COFFING

By: /s/ Jackie V. Nichols

Craig R. Anderson, Esq.
Nevada Bar No. 6882
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants Las Vegas
Metropolitan Police Department and
Captain Dori Koren

ORDER

IT IS ORDERED that ECF No. 25 is GRANTED.

IT IS FURTHER ORDERED that a stipulation to
dismiss or proposed scheduling order is due by
March 20, 2023.

IT IS SO ORDERED

DATED: 12:54 pm, January 18, 2023


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY AND OTHER DEADLINES PENDING SETTLEMENT DISCUSSIONS (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 17th day of January, 2023.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach